

From: [Mark Fisher](#)
To: [Nancy Hamill](#)
Cc: [Schick, Kevin](#); [Haklar, James](#); [Turner, Matthew](#)
Subject: RE: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek
Date: Tuesday, April 03, 2018 12:56:45 PM

Hi Nancy – I will discuss your response with Weston and get back to shortly. Thanks, Mark

From: Hamill, Nancy
Sent: Monday, April 2, 2018 2:52 PM
To: Mark Fisher
Cc: Schick, Kevin ; Haklar, James ; Turner, Matthew
Subject: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Hello Mark,

Thank you for submitting *Results of Supplemental Sediment Sampling, Crows Mill Creek*, February 19, 2018. I've completed an Ecological Component Review of the document and have a few questions/comments:

1. (p. 9) - Based on the information provided, I don't disagree with the overall conclusions regarding the potential for a separate BEHP contaminant source to the "CDG-382" area. The last bullet on p. 9 states that, based on data and concentration projections, the downstream extent from upstream sources are 1400-1800 feet downgradient of CDG 364 (where BEHP concentration = 58,000 mg/kg at 2.5-3' interval). However, the exact extent of contamination for which Weston is responsible is not clear. As per N.J.A.C. 7:26E-4.9, the RIR should clearly state the extent/dimensions of site-related contamination. Will Weston address BEHP and PCB contamination throughout the Northern and Central Portions of the AOC 25/Channel D area and into the Southern Portion to a distance of 1400-1800' downgradient of CDG 364, e.g., including CDG 364, 368, 373, and 374? I'm also still unclear about the conclusions for EPEC AOC4 in the May 2016 RIR. (RIR p. 2-72) - is Weston responsible for PCBs, BEHP, and NAPL in this area?
2. Was the contamination identified at multiple CDG-382 locations called into the hotline? If yes, please provide incident report number.
3. (p. 7) - The footnote indicates that a "scope of work" for the site-specific risk assessment will be submitted the department. SOWs are not typically submitted - is the intended submission an Ecological Risk Assessment (ERA) Work Plan? If so, please note that under the LSRP program, work plans are not reviewed. The *Ecological Evaluation Technical Guidance* should be followed. If site-specific eco-risk based remediation goals are determined, they will be forwarded to BEERA by BCAIN for approval.
4. Figure 1, *Southern Portion of Lowlands BEHP Results* (large-scale drawing dated 1/12/2018) incorrectly compares BEHP data to 22 mg/kg (approved for open water sediment in Woodbridge Pond only) and 49 mg/kg (former human health-based residential soil cleanup criterion). Data exceeding 0.75 mg/kg (ESC/SEL) should be highlighted in red (specified as the delineation goal on p. 7 of this document). Please correct this figure and similar figures

for the Northern and Central Portions for BEHP (assumed similar corrections needed) and resubmit all figures. It will facilitate the review if PCB and BEHP data are included together on the same figures, with sample dates and depths indicated. Please ensure that the CDG-382 delineation data are included on the revised figure for the Southern Portion.

Please respond at your earliest convenience. I can arrange a conference call if you'd like to discuss further.

Thank you.

Nancy

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